



# STATE OF IDAHO

## DEPARTMENT OF AGRICULTURE

C.L. "BUTCH" OTTER

Governor

CELIA R. GOULD

Director

April 10, 2012

Idaho Oilseed Commission  
Attn: Benjamin Kelly, Administrator  
55 SW 5th Avenue, Suite 100  
Meridian, ID 83642

Dear Mr. Kelly:

Over the past year, some issues have arisen in Idaho's canola and oilseed crop industry. The Idaho State Department of Agriculture (ISDA) has been reviewing these issues and how they may affect the Rules Relating to Rapeseed Production and Establishment of Rapeseed Districts in the State of Idaho (IDAPA Rule 02.06.13).

The first section ISDA would like to review is section 150 "Requirements for All Brassica Seeds To Be Planted in Idaho." Currently, section 150.01.b. requires:

"Brassica seed lots produced outside of Idaho be accompanied by a phytosanitary certificate stating that the seed is free (zero tolerance) from blackleg based on a laboratory test of a minimum of one and three tenths (1.3) ounces or ten thousand (10,000) seeds."

ISDA would like to alter this to reflect current standard industry testing procedures, or amend it to better suit Idaho's industry needs.

ISDA would also like to review the Production Districts as listed in the rule (section 050 – 100). Districts in the rule were created to define areas where specific "types" of rapeseed could be grown, usually edible or industrial. With the exception of District IV, all of the outlined districts allow exemptions to the "type" of oilseed grown in the district. With the presence of exemptions to "type" in every district, the meaningfulness of the district usage has diminished. Past discussions on this issue have led ISDA to understand that with the exception of District IV, most growers do not need the "type" restrictions in their areas.

Another reason to reconsider Production District definitions in IDAPA 02.06.13, is the increased use of rapeseed as a green manure crop to control nematodes. Potato growers especially have come to find value in growing a rapeseed crop prior to potato production. This practice will only increase the demand for exemption to "type" in the various districts.

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ISDA would like to open a discussion with the Oilseed Commission and interested parties on the revision of IDAPA Rule 02.06.13 at your earliest convenience. Please contact us at the address below should you have questions or concerns. We appreciate your feedback on the issues brought up in this letter.

Thank you,

A handwritten signature in black ink, appearing to read "Michael Cooper". The signature is fluid and cursive, with the first name "Michael" and last name "Cooper" clearly distinguishable.

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MC/LV

cc: Roger Batt  
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55 SW 5th Avenue, Suite 100  
Meridian, Idaho 83642



# STATE OF IDAHO

## DEPARTMENT OF AGRICULTURE

C.L. "BUTCH" OTTER

Governor

CELIA R. GOULD

Director

### MEMORANDUM

Date: February 14, 2012

To: Mike Cooper, Lloyd Knight

From: Liz Vavricka

Re: Blackleg Disease of Canola and the Rapeseed Rules IDAPA 02.06.13 Rules Relating to Rapeseed Production and Establishment of Rapeseed Districts in the State of Idaho

I recently attended a grain growers meeting in Boundary County, Idaho. At the meeting I gave a brief overview of the discovery of the fungus *Leptosphaeria maculans* (blackleg) in canola fields in Idaho. I also told them of our effort to trace back the route of the infection, but that we hadn't been successful because of the lack of seed to test. One of the growers present was the nephew of the "infected" grower, and confirmed the supposition that this disease has been in the county for more than just one year.

We discussed the rules regarding importation of seed from out of state. I let the growers know that seed dealers should have information about the origin of the seed, treatments used on the seed, and proof of "disease free" status via lab testing. I also explained that our inspectors would be checking in with seed dealers to insure this was the case.

Many growers commented that canola seed available in their county was often catch as catch can, and they felt lucky to get any. The University of Idaho breeder confirmed that Idaho didn't always receive the "choicest" seed, as we were a much smaller market than Canada or North Dakota. All did agree, however, that only treated seed was ever planted.

As a group, we then discussed the implications of the disease presence in their county. While growers were concerned, and willing to look for, and plant, clean seed, they didn't feel the disease was a particular threat. No one present produced seed nor knew of anyone that did in the area.

I also made some inquiries to make sure that the Oilseed Commission was a good point of contact and represented Boundary County growers. All present assured me that they felt comfortable with the Oilseed Commission representing them on any changes to the Rapeseed rules.

With regards to updating the Rapeseed Rules, I have been investigating protocols for testing seeds for *Leptosphaeria maculans*. So far I've contacted two labs in North Dakota, and seen written protocols for a lab in Canada (20/20), for International Seed Health Initiative (ISHI), and International Seed Testing Association (ISTA). All labs agree that 1000 seed test is the current standard. All labs also currently do a version of the "blotter towel" method. One lab in North Dakota may try Polymerase Chain Reaction (PCR) as well.

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I have not clarified whether the 1000 seed blotter method protocol is valid for treated seeds. ISTA validated their protocol using several labs, and it was only validated using untreated seeds. The ISHI method is the same as the ISTA. The lab protocol for 20/20 does not mention using treated seeds, but Monsanto sends their treated seed to 20/20 for testing. The North Dakota state lab also says that they feel comfortable using the blotter method with treated seeds.

I will contact 20/20 to see if they can supply me any data regarding the use of treated seed, and North Dakota state has said that they will forward any data they have. I will also check with Tim Paulitz at the Washington State University and Dilanthe Ferdinando at the University of Manitoba for their opinions, as they are experts with this pathogen.

Once we have settled on an acceptable protocol, we should approach the Oilseed Commission again, about initiating a rule change. My prior contact with the Oilseed Commission was a phone call with Rick Waitley in December 2011, to let them know about the discovery of *Leptosphaeria maculans* in Boundary County. I mentioned then that we would get back to them about possible rule changes in the future. One of the growers at the Boundary County meeting was a representative on the Oilseed Commission, and I spoke briefly to him about ISDA utilizing the commission as a base to reach the canola/rape growers. He agreed that the commission was a good method for contacting interested growers.